William Turner
Managing Director, Capacity LLC
12355 Sunrise Valley Drive, Suite 120
Reston, VA 20191

September 9, 2026

Steven Salander, Mayor
Members of City Council
City of Oregon
5330 Seaman Road
Oregon, Ohio 43616

Mayor Salander and Members of City Council:

Enclosed please find Capacity LLC's responses to the set of questions one of your citizens submitted to Capacity LLC in the spring/summer of 2026 regarding impacts the data center project may have on power infrastructure in the City of Oregon.

We appreciate everyone's patience as our team worked through this highly technical process. I also understand there is confusion about an "18-month load study" and want to clarify there is only one detailed load study. Studying power occurs in two phases: conceptual load study (CLS) and detailed load study (DLS). The CLS tells whether power is a "no" or "maybe;" the DLS tells us "no" or "yes." As I have stated previously, Capacity LLC received the CLS on January 24, 2025, marking the end of the first phase. We then began work on the DLS, the first draft of which was received on December 22, 2025. That accounts for 11 of the 18 months.

The remaining 7 months were spent revising the initial DLS. As I disclosed in detail at the February 2, 2026 city council meeting, the initial DLS provided a much longer timeframe to receive the full 500 MVA of power than we were led to believe but First Energy indicated there was a pathway to shorten this by 30 months if we were able to secure land and equipment for electrical infrastructure. This was the purpose of the third amendment council voted to approve on February 9, 2026, that provided us until September 30, 2026 to resolve. We are on track to meet this deadline.

As I noted to Mayor Salander and city officials at the July 28, 2026 introductory meeting, we had just received the revised DLS, specifically on July 27, 2026. As I made clear to city officials during this period, we needed the information from the DLS revision process to properly answer the citizen's questions below (also enclosed for the public record is the latest communication in this

regard sent on July 20, 2026). Once the revised DLS was received, our team began compiling and reviewing the enclosed answers while working through summer vacation schedules.

As you will read below, this project is a model for ratepayer protection that complements the many steps both Capacity LLC and Vantage Data Centers have taken to ensure this data center project benefits the people of Oregon, Ohio for many years to come.

Sincerely,

Will Turner
Managing Director
Capacity LLC

Cc:
Brodin Walter, City Administrator
Paul Roman, Services Director

Responses to Oregon Citizen Power Questions

1. What is the current load versus the design load of the line in question for the proposed data center?

Utilities do not share such information due to critical security risks. First Energy did perform a detailed load study, however, which determined the added load from the data center is acceptable for the existing transmission lines without impacting service in the area.

2. Was the load study positive or negative? If it was negative, what were the deficiencies and what are the recommendations from First Energy to address them?

The revised load study is positive.

3. What is the rating in megawatts of the proposed data center substation?

Electrical infrastructure for the project is designed to accommodate up to a 500 MVA utility load.

4. What are the potential safety hazards with the proposed data center substation?

Typical safety hazards involving substations such as arc flashes and high-voltage shock are long studied problems that modern engineering accounts for in design and operations.

5. What type and level of noise is expected from the proposed data center substation? What are the mitigation strategies?

Substations typically produce low-frequency electrical hums from transformers and mechanical noises from cooling fans and oil pumps. Like the data center, noise from the substation must adhere strictly to local noise ordinances.

6. Can we expect light pollution from the proposed data center substation? If so, what are the mitigation strategies?

The data center and the substation will both utilize shielded lighting to minimize light pollution.

7. Who is paying for the alternate substation equipment that Capacity LLC wants to use, Edison or Capacity LLC?

Consistent with being a signatory of the Ratepayer Protection Pledge, Vantage Data Centers is paying for the substation equipment, so costs are not borne by ratepayers.

8. How large and how much additional land will be required?

As publicly stated at the February 2, 2026 City Council meeting, Capacity LLC has been working since to assemble land along Wynnscape Drive to satisfy the Electric Infrastructure Contingency

agreed upon in the third amendment. If Wynnscape Drive is abandoned and added, the total area will be approximately 24 acres.

9. Will this substation encroach on the proposed site for OCE 2?

No.

10. Is it true that the OEDF or the developer is trying to buy additional land around the existing site?

As publicly stated at the February 2, 2026 City Council meeting, Capacity LLC has been working since to assemble land along Wynnscape Drive to satisfy the Electric Infrastructure Contingency agreed upon in the third amendment. As was also disclosed to City officials, Capacity LLC has a 24-acre parcel under contract south of the Blue Heron Drive and Corduroy Road intersection for the sole purpose of supporting construction activities on the main site. All parcels totaling approximately 214 acres of land are disclosed in the Economic Development Agreement. These parcels cover the full scope of the project.

OEDF is not buying additional land to support the project.

11. How much bridging power is Capacity LLC expecting to need to generate?

Onsite natural gas turbines are no longer being planned to generate power on the site. As written in a previous letter sent to Mayor Salander and City Council on February 27, 2026, a primary goal of the Electric Infrastructure Contingency agreed upon in the third amendment was "to right-size onsite bridging assets." Our goal is always to minimize impacts, and the team was able to secure transmission equipment and plan ramp schedules in a way to achieve removal of onsite natural gas power generation. First Energy's design engineers were key partners in this effort, and we appreciate their diligence in determining the feasibility and safety of this plan as it relates to the electric grid their company manages.

12. Is it true that diesel generators will be required on the site for backup? If so, how many and what size?

Yes, the use of diesel generators is standard for providing backup power to all mission-critical facilities, not just data centers. The full number and scope will vary depending upon the tenant that leases the data center facilities.

13. Can we expect to have blackouts in our community with the proposed data center? If so, how often and long lasting?

Residents should not expect to experience blackouts because of the data center. In the event there is a risk of blackouts for any reason, the US Department of Energy regularly directs PJM to

cut grid power to data centers to protect other ratepayers. Hospitals, grocery stores, and residents are the priority power users, not data centers.

14. Will the electricity rates for consumers in our community increase from the proposed data center? If so, why?

Electrical bills include both transmission and generation costs. Transmission costs are driven by how much utilities spend to build transmission infrastructure; not how much electricity moves through that infrastructure. Generation is usually a pass-through cost. The Oregon project is a model for protecting ratepayers on both fronts:

1) Capacity LLC located the project next to major transmission lines, greatly reducing the need for new transmission infrastructure to serve the data center; and
2) Vantage Data Centers will cover the costs of electric infrastructure equipment and construction, not ratepayers.
3) Vantage Data Centers plans to get power through a virtual PPA that brings new generation to the market to support the project and pays for the costs of that power.

At the macro level, claims that data centers drive up household electricity bills are inconsistent with the historical evidence. A June 2026 white paper by the Electric Power Research Institute (EPRI) titled "Have Data Centers Raised Your Electric Bill? Causal Evidence from the United States" found that data centers actually lowered residential electricity prices. EPRI compared states that experienced high data center growth against those that did not. They found a doubling of data center capacity correlated with a 3.5% decline in residential electricity prices.

Indiana Michigan Power provided a localized example of this trend on February 24, 2026. The utility announced that day it was filing to reduce base rates. In explaining their request Indiana Michigan Power stated, "This rate decrease is made possible by the load growth and increased revenue it is experiencing from large customers including data centers." The way to ensure data centers continue this trend is through projects like Oregon where the data center is located responsibly and covers the cost of its own infrastructure and generation.

15. How will the additional power usage affect the cost of maintenance on the equipment at First Energy and who will have to pay for this additional maintenance?

The EPRI white paper also highlights that the durability of demand created by data centers better positions utility companies financially to upgrade and maintain their networks. This is achieved through commonly recognized infrastructure economics where more demand spreads the fixed costs of that infrastructure across more usage. In sum, First Energy will have more revenue to pay for maintenance across its entire network to the benefit of all ratepayers they serve.

16. How will the increased energy demands from the proposed data center affect infrastructure upgrades at First Energy and who will pay for these upgrades?

The EPRI white paper also highlights that the durability of demand created by data centers better positions utility companies financially to upgrade and maintain their networks. This is achieved through commonly recognized infrastructure economics where more demand spreads the fixed costs of that infrastructure across more usage. In sum, First Energy will have more revenue to pay for upgrades across its entire network to the benefit of all ratepayers they serve.

17. In situations where there may be a high usage and First Energy may have to reduce services, how will they determine the ranking of whose services will be reduced? What will the order be?

The US Department of Energy regularly directs PJM to cut grid power to data centers to protect other ratepayers. Hospitals, grocery stores, and residents are the priority power users, not data centers.

18. Will the proposed data center operator have a Power Purchasing Agreement with First Energy?

First Energy only transmits power. Vantage Data Centers plans to get power through a virtual PPA that brings new generation to the market to support the project and pays for the costs of that power.

19. Will the electrical power usage of the proposed data center be clearly disclosed to the public?

Fluctuations that may occur are not disclosed to the public for security reasons, but electrical infrastructure for the project is designed to accommodate up to a 500 MVA utility load.

20. Since First Energy will financially profit from having a large customer such as a data center in Oregon, OH, what kind of benefits might First Energy be willing to provide our city?

It is appropriate for First Energy to have this discussion with city officials and residents separately.

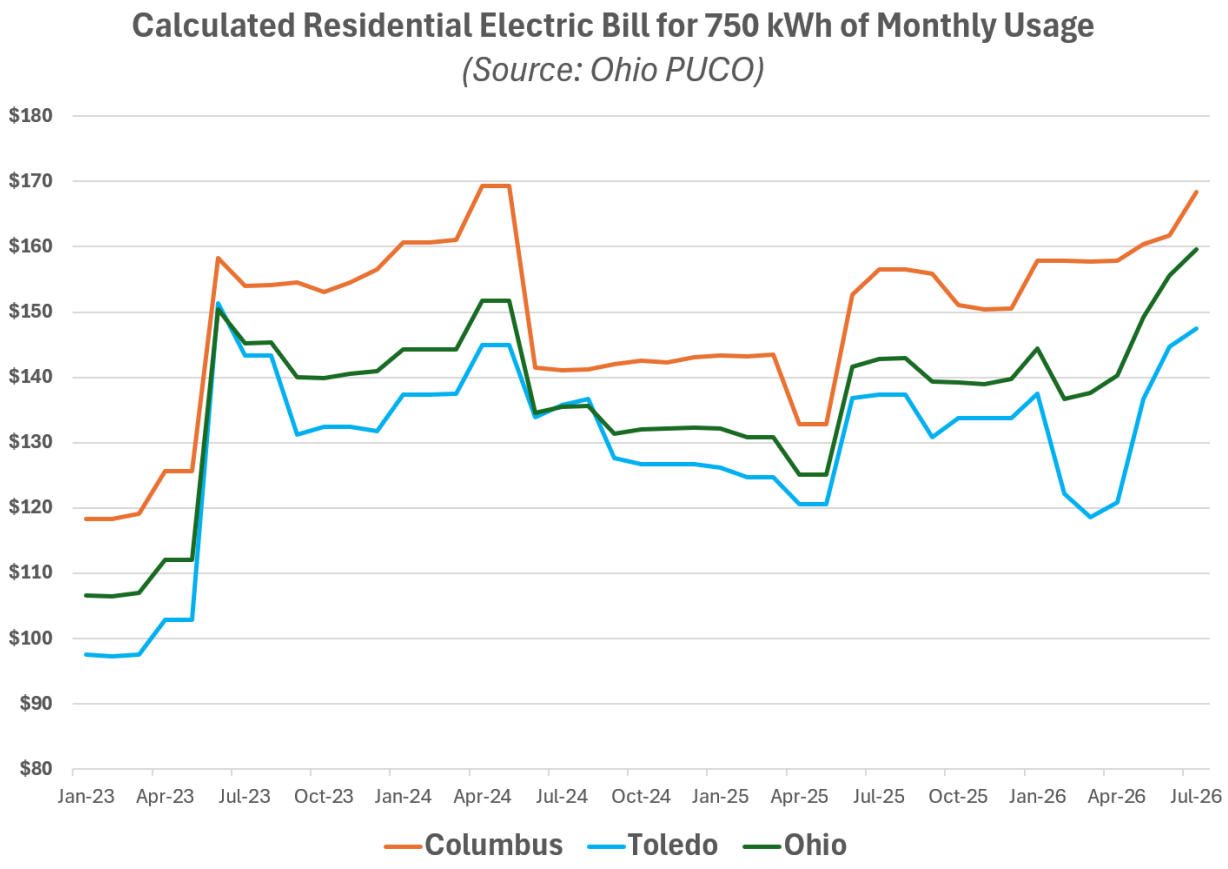
21. We have heard that PJM may pass through costs for upgrading electrical transmission lines to service the Columbus area data centers to all electrical consumers in the states that they service, including First Energy's customers. Is this the case, and what effect will this have on electricity rates in this area?

It is appropriate for First Energy to respond to how factors at the grid-level and in other regions may impact their pricing models separately.

22. News stories have reported that electrical bills in the Columbus area have jumped 250% since several data centers have gone into operation. If the several data centers here in Northwest Ohio are built, can residential customers in this area expect the same magnitude of increase in our bills?

We could not substantiate this claim and do not know the context of the time period for the reported increase. Anecdotal claims in the news of electrical bills "doubling" further do not provide context around a particular homeowner's circumstances and usage. The appropriate way to assess residential electrical bills around Columbus, Toledo, and Ohio is to draw from the Ohio Public Utilities Commission (PUCO) database.

PUCO data shows no evidence of a 250% jump in the Columbus region for an average household electrical bill. When the first hyperscale data center opened there in October 2016, a household using 750 kWh would have paid $103.50 that month. That same bill in July 2026 would be $168.43, a 62% increase. This does not establish that data centers caused the increase; pricing over this period has fluctuated widely due to several factors. For reference, the chart below shows the most recent years from January 2023 to July 2026:



Firstly, this chart shows that a large spike in household electric bills occurred in 2023. PUCO attributed this spike to delays in capacity auctions caused by the Federal Energy Regulatory Commission that disrupted Ohio's wholesale procurement market. The point is that other factors can impact electrical pricing at any given time. For example, PJM pricing is sensitive to the availability of natural gas because the grid typically draws 40-45% of its power from this source. Retiring coal plants before replacing that generation has also reduced the available supply of power at a critical time. More renewable energy requires building more transmission infrastructure; costs that can be passed through to ratepayers. For reference, the National Renewable Energy Laboratory (NREL) and Princeton University both modeled that switching to renewables may require a "two to fivefold-increase" in transmission capacity.

Secondly, the chart reveals that in 2026 the Toledo area experienced an outlier dip and rebound in electrical prices. The region historically tracks below state averages. Given that Toledo does not yet have any operational hyperscale data centers while Columbus has several, the more modest increase in the Columbus area does not indicate data centers are to blame for local variations. The dip was due to PUCO ordering First Energy in mid-February to cut prices by March 1. Ratepayers in the area may now be experiencing the whiplash effect of that relief.

At the macro level, claims that data centers drive up household electricity bills are inconsistent with the historical evidence. A June 2026 white paper by the Electric Power Research Institute (EPRI) titled "Have Data Centers Raised Your Electric Bill? Causal Evidence from the United States" found that data centers actually lowered residential electricity prices. EPRI compared states that experienced high data center growth against those that did not. They found a doubling of data center capacity correlated with a 3.5% decline in residential electricity prices. The way to ensure data centers continue this trend is through projects like Oregon where the data center is located responsibly and covers the cost of its own infrastructure and generation.

23. Has the Regional Growth Partnership contacted First Energy with any load forecasts for future demand, and has this been discussed and have plans been made for infrastructure improvements in this area?

It is appropriate for First Energy to respond to questions regarding their overall load forecasting and investments for the region separately.

24. Will First Energy implement the policy recently adopted by AEP (due to a court decision) with regards to making data centers forecast and pay for a significant percentage of their anticipated load for a period of at least 10 years, regardless of actual usage?

It is appropriate for First Energy to respond to questions regarding their business model separately.

25. What effect will the Meta project in Middleton Township have on First Energy's infrastructure, and will the addition of the proposed data center in Oregon cause additional infrastructure improvements to be required? If so, will these costs be paid for by either Meta, the as yet unnamed end user in Oregon, or both?

It is appropriate for First Energy to respond to questions regarding the Meta project in Middleton Township separately. The Oregon project is a model for protecting ratepayers:

1) Capacity LLC located the project next to major transmission lines, greatly reducing the need for new transmission infrastructure to serve the data center; and
2) Vantage Data Centers will cover the costs of electric infrastructure equipment and construction, not ratepayers.
3) Vantage Data Centers plans to get power through a virtual PPA that brings new generation to the market to support the project and pays for the costs of that power.

will.turner@upterragroup.com

From: will.turner@upterragroup.com
Sent: Monday, July 20, 2026 10:36 AM
To: 'Paul Roman'
Cc: 'Steven Salander'; 'Brodin Walters'
Subject: RE: Concerned Citizen Questions Submitted to First Energy on 03/30/2026

Paul,

Sorry for the delay, I was on vacation last week.

That is our preference. I do want to reiterate that we are continuing to work through design details with First Energy during the Electric Infrastructure Contingency Period that must be finalized before we are able to formally answer these questions. Electrical engineering is a complex process that requires numerous checkdowns to be done properly. The answers to many of these questions are tied to information we still need to resolve the contingency. We are making steady progress, however, even at First Energy's pace.

As you and I discussed on July 9, we were able to begin surveying the entire Electric Infrastructure area last week. As you know, that area includes the properties along Wynnscape Drive that I publicly highlighted at the February 2 council meeting we were going to pursue to satisfy this contingency. Assuming no unforeseen issues arise during due diligence, we should be on schedule to meet the September 30 deadline.

Nature Park Follow-up
Lastly, I also want to follow up on Capacity's offer to fund a nature park in Oregon. There was never any formal response to the offer I sent City Council on February 27, and I've neither seen nor heard of any consideration of it. Is there no interest in the nature park from City Council? Was it at least raised in Tree Commission meetings?

Again, that offer and the donation to Oregon Public Schools from Capacity are separate and additional to whatever community benefits you negotiate with the user in the EDA. My partners and I would appreciate any feedback.

Thank you,
Will

Will Turner
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UPTERRA

From: Paul Roman <proman@oregonohio.org>
Sent: Wednesday, July 15, 2026 3:21 PM
To: Will Turner <will.turner@upterragroup.com>

Cc: Steven Salander <ssalander@oregonohio.org>
Subject: FW: Concerned Citizen Questions Submitted to First Energy on 03/30/2026

Will,

I believe Capacity and First Energy are providing a joint written response to said questions. Please let me know if this is incorrect. Thanks.

Paul Roman
Director of Public Service
City of Oregon, Ohio
5330 Seaman Road
Oregon, Ohio 43616
419-698-7046

OREGON
OPPORTUNITY ON THE BAY

From: Constance Trudell <REMOVED>
Sent: Tuesday, July 14, 2026 10:50 AM
To: Paul Roman <proman@oregonohio.org>; Steven Salander <ssalander@oregonohio.org>
Subject: Re: Concerned Citizen Questions Submitted to First Energy on 03/30/2026

Good Morning Mr. Roman and Mayor Salander,

Could you ensure that Mr. Will Turner is aware we need **written responses** to all 25 of the concerned citizen questions, submitted to him on 06/09/2026, and First Energy on 03/30/2026?

When you receive answers to these questions, please let me known. Thank you very much for your assistance.

Sincerely,

Connie Trudell

From: Constance Trudell <REMOVED>
Sent: Tuesday, June 9, 2026 9:40 AM
To: Paul Roman <proman@oregonohio.org>
Subject: Re: Concerned Citizen Questions Submitted to First Energy on 03/30/2026

Thank you very much, Mr. Roman.

From: Paul Roman <proman@oregonohio.org>
Sent: Tuesday, June 9, 2026 9:25 AM
To: Constance Trudell <REMOVED>
Subject: FW: Concerned Citizen Questions Submitted to First Energy on 03/30/2026

FYI